

REMARKS

Reconsideration of this Application is respectfully requested.

With the foregoing amendment, claims 1-19 are pending in the application, with claims 1, 7, 13, and 19 being in independent form. Claim 19 has been added. No new matter has been added to the application.

Based on the following remarks, Applicants respectfully requests that the Examiner reconsider all outstanding objections and rejections, and that they be withdrawn.

Objection to the Drawings

At paragraph 1 and 2 of the Office Action, the Figure 1 is objected to. Applicants request that the Office hold this objection in abeyance until allowable subject matter is indicated. At that time, Applicants will have formal drawings prepared.

Objection to the Specification

At paragraph 3 of the Office Action, the specification is objected to because of an informality. Applicants have amended the specification herein to cure the informality.

Rejection Under 35 U.S.C. § 103

The Office has rejected claims 1, 2, 7, and 13-14 under 35 U.S.C. 103(a) as being unpatentable over *Wheatley et al.* (US 5,212,730) (hereafter "*Wheatley*"). Applicants respectfully traverse these rejections and submit that the rejected claims are allowable over the art of record.

With respect to independent claim 1, Applicants submit that the Office has not established a *prima facie* case of obviousness. To establish a *prima facie* case of obviousness, the Office must show that there is some teaching, suggestion, or motivation to modify *Wheatley* to produce the claimed invention. See *M.P.E.P.* § 2143.

In this case, Applicants submit that there is no such suggestion or motivation to modify *Wheatley*. For example, at the least, there is no teaching, suggestion, or motivation to modify *Wheatley* such that when modified *Wheatley* teaches or suggests the step of:

converting ... data representing ... first and second names
to first and second pronunciation equivalent phonetic alphabet
representations

as is recited in claim 1.

Wheatley teaches a name recognition technique. The name recognition technique taught by *Wheatley* involves the following steps:

- (1) entering text into a database, wherein the text corresponds to a name;
- (2) constructing one or more acoustic recognition models for each name stored in the database;
- (3) storing the recognition models constructed in step (2);
- (4) receiving a spoken name input; and
- (5) comparing the spoken name input with the stored recognition models to determine whether there is a match between the spoken name input and one of the recognition models.

See Wheatley, col. 2, lines 23-35, and col. 3, lines 59-62.

Consequently, *Wheatley* teaches a first proper name (i.e., the received spoken name) and a second proper name (i.e., a name stored in the database). *Wheatley* further teaches converting the second proper name to an acoustic recognition model of the second proper name and comparing the acoustic recognition model to the received spoken name (the "first proper name"). In short, *Wheatley* teaches using voice recognition technology to access records stored in a database.

In contrast, the present invention according to claim 1 is a method for comparing a first proper name to a second proper name. The method includes the steps of: (1) converting data representing the first proper name to a first "pronunciation equivalent phonetic alphabet representation" (hereafter "PEPAR"); (2) converting data representing the second proper name to a second PEPAR; and (3) comparing the first PEPAR to the second PEPAR.

Wheatley simply does not teach or suggest the claimed invention. For example, at the least, *Wheatley* does not teach or suggest that *both* the first and second proper names are converted to a PEPAR. *Wheatley* only teaches and suggests that the second proper name (i.e., the name in the database) is converted to an acoustic recognition model. Thus, even assuming for the sake of argument that an "acoustic recognition model" teaches or suggest a PEPAR (it

does not), *Wheatley* does not teach or suggest converting *both* the first proper name and the second proper name to a PEPAR. Furthermore, there is simply no teaching, motivation, or suggestion found in the art of record that would lead one to modify *Wheatley* such that the spoken name (i.e., the first proper name) is converted to a PEPAR.

Because *Wheatley* does not teach or suggest converting both the first and second proper name to a PEPAR, which is a feature of claim 1, and because there is no teaching, suggestion or motivation to modify *Wheatley* to produce the claimed invention, Applicants respectfully request that the rejection of claim 1 be withdrawn.

With respect to independent claims 7 and 13, the above remarks for claim 1 apply because both claim 7 and 13 include, among other features, the feature of constructing a first PEPAR from a first proper name, constructing a second PEPAR from a second proper name, and comparing the first PEPAR to the second PEPAR. Applicants, therefore, respectfully request that the rejection of claims 7 and 13 be withdrawn.

With respect to claims 2, 3-6, 8-12, and 14-18, these claims are allowable for at least the reasons given above because these claims depend from one of claims 1, 7, and 13.

New Claims

Claim 19 has been added. It is believed that claim 19 is allowable over the art of record because the art of records fails to teach or suggest all of the features of claim 19. Support for claim 19 may be found at, among other locations, page 9, line 17 to page 10, line 18.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections, and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Attached hereto is a marked-up version of the changes made to the specification and/or claims by the current Amendment. The attached page is captioned "**Version with Markings to Show Changes Made.**"

Favorable consideration of this application is respectfully requested.

Respectfully submitted,

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Version with markings to show changes made

In the Specification

The paragraph beginning on page 18, line 21, has been amended as follows:

--As an example of the advantages of matching on IPA, consider a query on the name Lee. Converted to the IPA string [li], exact matches with numerous spelling variants are automatic, including Leigh and Li. Typical prior-art character based matches will fail to retrieve Leigh or Li, since the percentage of character overlap is minimal. Conversely, a standard index matching system such as Soundex will categorize Lee and Li identically, but will still miss Leigh, given the [presenve] presence of a salient letter (g), and will retrieve a large number of names of low relevance, including Lu, Liao, Low, Louie, Lahoya, and Lehw. The IPA analysis process is further described in Appendix F, which forms a part of this specification.--

The paragraph beginning on page 20, line 1, has been amended as follows:

--One preferred embodiment implementing many desirable features of the system shown in Figure 1 is a standalone database search and retrieval program. In addition to including the features described above (and in further detail in the Appendices), this embodiment of the invention may preferably be implemented according to the disclosure in Appendices G, H, [1]I, and J, which form a part of this specification and are: a narrative description, technical plan, acceptance test, and source code listing respectively for a system demonstrating numerous features of the present invention.--